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March 18, 2015

**Via ECF**

The Honorable Denise L. Cote  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Request to File Under Seal**

*NCUA v. RBS Securities Inc.*, No. 13-6726 (S.D.N.Y.)

*NCUA v. RBS Securities Inc.*, No. 11-5887 (C.D. Cal.)

*NCUA v. RBS Securities Inc.*, No. 11-2649 (D. Kan.)

Dear Judge Cote:

RBS filed today a letter motion to compel damages discovery from Plaintiff National Credit Union Administration Board (“Plaintiff”) in the above-captioned matters. Exhibits A–C to that letter motion, a list of which is attached hereto, were designated Confidential by Plaintiff pursuant to the Master Protective Order (ECF No. 102) entered in these matters. Paragraph 9 of the Master Protective Order provides:

In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

In accordance with Rule 4(A) of the Court’s Individual Practices in Civil Cases, and Paragraph 9 of the Master Protective Order, RBS requests that Exhibits A–C to its letter motion be filed under seal in accordance with the rules of Court, and kept under seal until further order of the Court.

**KIRKLAND & ELLIS LLP**

Very truly yours,

*/s/ R. Alexander Pilmer*

R. Alexander Pilmer

cc: Counsel of Record (via ECF)

**KIRKLAND & ELLIS LLP**

**Documents Requested To Be Filed Under Seal**

Exhibit A	Excerpts from Plaintiffs' Amended Responses to Defendants' First Set of Joint Interrogatories
Exhibit B	NCUA Guaranteed Notes Trust 2010-R2 Offering Memorandum
Exhibit C	NCUA Guaranteed Notes Trust 2010-R2 Cross-Receipt